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The motion to seal is granted temporarily. The Court will assess whether to keep the materials at issue sealed or redacted when deciding the underlying motion. The Clerk of Court is directed to terminate ECF No. 115. SO ORDERED.

**Via ECF**

Hon. Jesse M. Furman  
United States District Court for the  
Southern District of New York  
40 Foley Square  
New York, New York 10007



April 17, 2024

Re: UMB Bank, N.A. v. Bristol Myers Squibb Company, No. 21 Civ. 4897 JMF

Dear Judge Furman,

We write on behalf of Plaintiff UMB Bank, N.A. (“UMB”), solely in its capacity as Trustee under the Contingent Value Rights Agreement. UMB respectfully requests leave to file under seal exhibits to a letter submission providing additional record evidence that was unavailable at the time UMB filed its Opposition to Defendant Bristol-Myers Squibb Company’s (“BMS”) Motion to Dismiss, ECF No. 97. The exhibits include information about the identity and holdings of CVR holders who are nonparties to this litigation.

Consistent with the Court’s February 5, 2024 Order, we respectfully request that the Court temporarily grant UMB’s motion to seal and “assess whether to keep the document[s] at issue sealed or redacted when resolving the underlying dispute.” ECF Nos. 78, 109. We intend to meet and confer with BMS about sealing in connection with BMS’s pending motion to dismiss.

Respectfully submitted,



Maria Ginzburg  
Managing Partner